

ORIGINAL

CC TO JUDGE

Hon Marshall J. Pechman



JUL 18 2002

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY
BY

UNITED STATES DISTRICT COURT
WESTERN DIVISION OF WASHINGTON
AT SEATTLE

MERCHANTS CREDIT CORPORATION,)
Plaintiff,)

NO C02-998P

vs)
JAMES F WALKER and ELLIE WALKER)

JOINT STATUS REPORT
AND DISCOVERY PLAN

Defendants/Thir)
Party Plaintiffs,)

vs)

GREAT-WEST LIFE & ANNUITY)
INSURANCE COMPANY,)

Defendants)

Thir-Party Defendants)

)

Pursuant to the Court's Order dated June 8, 2002, the parties file with the Clerk of Court this joint status report

1 Nature and complexities of the case The parties agree that this case is not complex
Plaintiff Merchants Credit Corporation is the assignee for collection of the claim of
Evergreen Healthcare Plaintiff filed suit against Mr and Mrs Walker in King
County District Court, Northeast Division, upon an unpaid principal balance of
\$17,928 26, for healthcare-related services The Walkers answered, and brought in
Great-West Life as a Thir-Party Defendant, which then removed the state action
to this Court

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CV 02-00998 #000000008

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2 Which ADR method should be used Mediation

3 When mediation should take place After the close of discovery

4 Proposed deadline for joining additional parties Defendants and third party
5 plaintiffs may add an additional party. A deadline for joining additional parties of
6 October 18, 2002 is therefore suggested.

7 Proposed discovery plan:

8 A FRCP conference was held July 2, 2002, and the parties anticipate that
9 FRCP 26(a) disclosures will take place July 13, 2002

10 B Plaintiff does not anticipate the need for much, if any, discovery Defendant
11 will conduct discovery directed at ascertaining violations by third-party
12 defendant of the Washington Consumer Protection Act, the Washington
13 Insurance Code and regulations Third-party defendant will conduct discovery
14 related to ERISA issues

15 C None

16 D Each party will be limited to three depositions, with possible need for
17 interrogatories and requests for production of documents

18 E None

19 Discovery Completion Date March 31, 2003

20 Magistrate Judge or Judge Judge

21 Bifurcation No

22 LRCR 16 statements and pretrial order Should be waived

23 Other suggestions for shortening case None

24 Date ready for trial May, 2003

25 Jury demand Nonjury.

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1 13. Trial days Two days maximum

2 14. Names, addresses and telephone numbers of all trial counsel:

3 a. Plaintiff Robert S Friedman, 2245 152nd Ave NE, Redmond, WA
4 98052, (425) 643-9520

5 b. Defendant: Scott C Breneman, c/o Breneman Law Firm, 1080 Broadacres
6 Bldg, 1601 Second Ave, Seattle, WA 98101, (206) 224-1650


7 c. Third-Party Defendant: Bullivant/Houser/Bailey, P C, and Medora A
8 Marisseau and Heidi M Eckel; 2400 Westlake Office Tower, 1601 Fifth
9 Ave, Seattle, WA 989101-1618

10 15. N/A

11 16. Scheduling conference desired: No

12 Dated this 11th day of July, 2002

13 LAW OFFICES OF ROBERT S FRIEDMAN

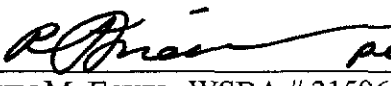
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16 ROBERT S FRIEDMAN, WSBA #1854
17 Attorney for plaintiff

18 BRENEMAN LAW FIRM

19
20  - per fax approval
21 SCOTT C BRENEMAN, WSBA # 18486

22 Attorney for defendants / Third
23 Party Plaintiffs Walker

24 BULLIVANT/HOUSER/BAILEY PC

25  per phone approval
26 MEDORA A MARISSEAU, WSBA #23114 Heidi M ECKEL, WSBA # 31596

27 Attorneys for Third-Party Defendant Great-West Life & Annuity

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